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August 27, 2015

**VIA E-MAIL TRANSMISSION  
AND ECF FILING**

The Honorable Robert E. Gerber  
United States Bankruptcy Judge  
United States Bankruptcy Court  
Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green  
New York, New York 10004

**Re: In re Motors Liquidation Company, *et al.*  
Case No. 09-50026 (REG)**

**Letter Regarding Update on Related Proceedings**

Dear Judge Gerber:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“**New GM**”) in the above-referenced matter. Pursuant to Your Honor’s Endorsed Order dated May 5, 2015 [Dkt. No. 13131], we write to update the Court regarding developments in proceedings relating to New GM’s Motions to Enforce. Specifically,

1. Today, August 27, 2015, counsel for New GM and Lead and Liaison Counsel filed with the United States District Court for the Southern District of New York (“**District Court**”), a joint letter (“**Joint Letter**”) addressed to Judge Furman to advise on matters of possible significance in proceedings related to MDL 2543, which includes an update on the status of this bankruptcy case. A copy of the Joint Letter, without exhibits,<sup>1</sup> is attached hereto as **Exhibit “A.”**

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<sup>1</sup> There are 31 exhibits annexed to the Joint Letter, most of which are documents that have previously been filed with this Court; the other documents are either attached as exhibits to this letter, or do not appear relevant to this bankruptcy case. To the extent the Court believes any other exhibits should be filed, New GM will do so promptly.

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2. Judge Furman entered an *Order* on August 17, 2015, denying the Ignition Switch Plaintiffs, Non-Ignition Switch Plaintiffs, and the States' motions to withdraw the reference and explained that the reasons for his *Order* would be stated in a subsequent opinion.<sup>2</sup> Today, August 27, 2015, Judge Furman entered his *Opinion and Order* providing the reasons for denying the motions to withdraw the reference. A copy of the *Opinion and Order* is attached hereto as **Exhibit "B."**

Respectfully submitted,

/s/ Scott I. Davidson

Scott I. Davidson

AJS/sd  
Encl.

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<sup>2</sup> New GM provided the Court with a copy of the Order in its update letter dated August 17, 2015 [Dkt. No. 13381].